



Todd & Weld LLP

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Via ECF

January 23, 2020

Honorable Loretta A. Preska
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2220
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**
Request Pursuant to Individual Practice Rule 2.C

Dear Judge Preska,

Pursuant to Rule 2.C of Your Honor's Individual Practices, Defendant Alan Dershowitz hereby requests leave to file a Memorandum of Law of up to 25 pages in opposition to Plaintiff's Motion for Leave to File an Amended Complaint.

As grounds therefor, Prof. Dershowitz states that his memorandum must address a variety of legal defects concerning the several new claims alleged in Plaintiff's proposed Amended Complaint, some of which raise constitutional issues meriting thorough discussion.

We have conferred with Counsel for Plaintiff, Nicole Moss, and she has indicated that Plaintiff does not object to this request, provided that Plaintiff may have an additional five pages for her reply if necessary.

Thank you.

Respectfully Submitted,

Kristine C. Oren

CC: Plaintiff/Cooper & Kirk P.L.L.C. via ECF